

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

REENA S. MATHEW,

Plaintiff,

v.

SANTANDER CONSUMER USA INC.,

Defendant.

§
§
§
§
§
§
§
§
§

CIVIL ACTION NO. 3:23-CV-01494-N

DEFENDANT'S EXHIBIT LIST

TO THE CHIEF UNITED STATES DISTRICT JUDGE DAVID C. GODBEY:

Pursuant to the Court's Order Resetting Trial [Doc. No. 31], Defendant Santander Consumer USA Inc. ("Santander") hereby submits the following Exhibit List:

EXH NO.	DATE	DESCRIPTION	BATES	OFF.	OBJ.	ADM.
1	8/22/24	Declaration of Yessica Perez				
2	8/22/24	Declaration of Sabrina Boyd				
3	8/22/24	Declaration of Stephanie Elad				
4	8/22/24	Declaration of Tina Mohan				
5	3/2/22	Declaration of Fatma Rizvan	SC000165–166			
6	3/7/22	Declaration of Nicole Prior	SC000210–212			
7	3/7/22	Declaration of Christina Stout	SC000203–205			
8	3/7/22	Declaration of Whitney Andres	SC000167–169			
9	2013	Excerpts of Santander 2013 Associate Handbook	SC000860–906			
10	2015–2016	Santander You Earned It Tenure Audits	SC010411			
11	9/5/13	Instant Message Exchange Between Mathew and Hortensia Perez	SC011277–278			
12	2/14/14	Instant Message Exchange Between Mathew and Ms. Turilli	SC002847			

EXH NO.	DATE	DESCRIPTION	BATES	OFF.	OBJ.	ADM.
13	3/13/14	Instant Message Exchange Between Mathew and Hortensia Perez	SC011279			
14	11/21/14	Instant Message Exchange Between Mathew and Ms. Turilli	SC002655			
15	12/1/14	Instant Message Exchange Between Mathew and Mr. Vinson	SC011280			
16	1/22/15	E-mail Exchange Between Ms. Elad and Ms. Turilli	SC001449–1450			
17	1/22/15	E-mail Exchange Between Mathew and Ms. Turilli	SC000042–43			
18	2/15–12/15	Addendum Timeline of Mathew Events	SC004172–4176			
19	4/1/15	Instant Message Exchange Between Mathew and Ms. Hullum	SC002732			
20	4/5/15	E-mail Exchange Between Ms. McDonnell and Ms. Hullum	SC000802–803			
21	4/3/15	E-mail Exchange Between Mr. Holt and Ms. Hullum	SC000810–814			
22	4/6/15	E-mail Message From Ms. Andres to Ms. Hullum	SC000799–800			
23	4/9/15	E-mail Exchange Between Mathew and Ms. Hullum	SC003720–3721			
24	4/9/15	E-mail Exchange Between Mathew and Ms. Hullum	SC003862–3863			
25	5/18/15	E-mail Message From Mathew to Ms. Hullum	SC003416			
26	12/17/15	E-mail Exchange Between Ms. Hullum and Ms. Lagunes	SC001332			
27	7/10/15	E-mail Exchange Between Mathew and Ms. Hullum	SC003731–3732			
28	8/12/15	E-mail Exchange Between Mathew and Mr. Wiener	SC003077–3079			
29	8/13/15	E-mail Message From Mathew to Ms. Hullum	SC004392–4393			
30	2/15/15	E-mail Exchange Between Ms. Perez and Ms. Malone	SC006276			
31	9/15–10/15	Mathew Outlook Calendar Invites to Ms. Perez	SC003002–3003, 3012–3013, 4180–4181, 4098–4099			
32	9/9/15	E-mail Message From Ms. Perez to Ms. Boyd, Mathew, and Ms. Perez	SC005719			
33	9/15	Ms. Hullum's 2015 Mid-Year Review of Reena Mathew	SC001484–1495			
34	9/17/15	Instant Message Exchange Between Mathew and Ms. Perez	SC002656			
35	9/25/15	E-mail Message From Ms. Perez to Ms. Elad	SC007192			
36	10/29/15	E-mail Message From Ms. Perez to Ms. Elad	SC006640			

EXH NO.	DATE	DESCRIPTION	BATES	OFF.	OBJ.	ADM.
37	10/29/15	Instant Message Exchange Between Mathew and Ms. Perez	SC002730			
38	11/2/15	E-mail Message From Ms. Elad to Ms. Perez	SC007323			
39	11/16/15	Instant Message Exchange Between Mathew and Ms. Perez	SC002773			
40	11/20/15	Instant Message Exchange Between Mathew and Mr. Dieckmann	SC010471			
41	11/20/15	E-mail Exchange Between Mathew and Ms. Boyd	SC011275-011276			
42	11/21/15	E-mail Message From Ms. Crouch to Ms. Kelch	SC009007-9008			
43	11/24/15	E-mail Exchange Between Ms. Elad and Ms. Perez	SC008392			
44	11/21/15	E-mail Message From Ms. Elad to Ms. Blackburn	SC001067			
45	11/24/15	E-mail Exchange Between Ms. Elad and Ms. Whatley	SC007514			
46	11/24/15	E-mail Exchange Between Ms. Elad and Ms. Perez	SC008392-8393			
47	11/25/15	E-mail Exchange Between Ms. Elad and Ms. Hanes	SC009619-9620			
48	12/1/15	Santander Consumer USA, Inc. Performance Improvement Plan	SC005409-5412			
49	12/8/15	E-mail Exchange Between Ms. Perez and Ms. Elad	SC006128-6129			
50	12/10/15	E-mail Message From Ms. Elad to Ms. Blackburn	SC001120-1121			
51	12/10/15	E-mail Message From Ms. Hullum to Ms. Elad	SC001118, 1152			
52	12/15/15	E-mail Message From Ms. Perez to Ms. Elad	SC005429-5431			
53	12/22/15	E-mail Exchange Between Mr. Shaffer and Ms. Elad	SC000004-5			
54	12/28/15	E-mail Exchange Between Mathew and Ms. Perez	SC004058-4060			
55	12/31/15	E-mail Exchange Between Ms. Blackburn and Ms. Elad	SC000014-15			
56	1/13/16	E-mail Exchange Between Ms. Perez and Ms. Elad	SC000009			
57	2016	Santander Consumer USA, Inc. 90 Day Performance Improvement Plan	SC000708-716			
58	1/18/16	E-mail Exchange Between Ms. Elad and Ms. Perez	SC001053-1054			
59	1/27/16	E-mail Message from Mathew to Mathew	SC002926-2932			
60	1/27/16	E-mail Exchange Between Mathew and Mr. Shaffer	SC005140-5145			
61	2016	Mr. Shaffer Final Report of Reena Mathew	SC000021-30			

EXH NO.	DATE	DESCRIPTION	BATES	OFF.	OBJ.	ADM.
62	2/1/16	E-mail Message from Mathew to Ms. Perez	SC004104			
63	2/15–12/15	Addendum Timeline of Events - Mathew	SC004172–4176			
64	2/23/16	E-mail Exchange Between Ms. Elad and Mathew	SC001047–1049, 9650–9652			
65	3/29/16	E-mail Exchange Between Ms. Elad and Ms. Hanes	SC000931–933			
66	4/14/16	E-mail Exchange Between Mr. Shaffer and Ms. Elad	SC008785–8786, 717–719			
67	11/24/15	Instant Message Exchange Between Mathew and Ms. Perez	SC002752			
68	3/28/16	E-mail Exchange Between Ms. Perez and Ms. Elad	SC006633–6634			
69	3/21/16	E-mail Exchange Between Ms. Perez and Ms. Hanes	SC005961–5962			
70	2013	Santander Consumer USA, Inc. Progressive Discipline Policy 2013	SC010464–10470			
71	1/18/16	E-mail Exchange Between Ms. Hullum and Ms. Elad	SC001105–1107			
72	10/11/24	Declaration of Sabrina Boyd				
73	2012	R. Mathew's 2012 Annual Objectives	SC000987–990			
74	7/30/15	E-mail message from R. Mathew to A. Hullum	SC000837			
75	8/24/15	HR Org. Change Announcement from S. Elad	SC008380–8381			
76	11/23/15	E-mail message from R. Mathew to Y. Perez	SC004226–4227			
77	11/24/15	E-mail message from R. Mathew to Y. Perez	SC004491–4492			
78	1/11/16	E-mail message exchange between S. Elad, S. Shaffer, A. Hullum, and Y. Perez	SC008177–8179			
79	3/8/16	Instant Message Exchange Between R. Mathew and S. Boyd	SC001799–1802			
80	4/8/16	E-mail message from R. Mathew to Y. Perez	SC004212–4213			
81	1/18/16	E-mail to Stephen Shaffer from Reena Mathew	SC004169–4176			
82	9/14/15	Event: One on One	SC002358			
83	3/10/16	E-mail to Reena Mathew from Yessica Adriano, Subject: FW: Investigation Summary-Jacqueline M. Smith	SC005273–5275			
84	4/1/24	Plaintiff's Amended Answers to Defendant's First Set of Interrogatories				
85	2015	Activity at a Glance	SC000852–853			

EXH NO.	DATE	DESCRIPTION	BATES	OFF.	OBJ.	ADM.
86	11/5/15	E-mail to yadriano from YouEarnedIt	SC007909–007910			
87	3/3/2015	E-mail to Angeline Hullum from Reena Mathew, Subject: RE: Annette Williams	SC000018			
88	7/2/2015	E-mail dated to Hortensia Perez from Yessica Adriano, Subject: RE: Associate Cedric Phillips	SC005321–323			
89	11/18/2015	E-mail dated to Yessica Adriano from Angeline Hullum, Subject: RE: Reena and Sabrina Annual Review	SC009280			
90	12/8/2015	E-mail 2015 to Yessica Adriano from Jeffrey Wiener, Subject Summary of HR Conversation	SC007933–934			
91	12/10/2015	E-mail to Stephanie Elad from Yessica Adriano, Subject: FW: Leave Early Requests	SC001119			
92	8/20/13	Instant message exchange from Mathew to Ms. Hullum	SC002616			
93	11/16/15	Instant message exchange from Mathew to Ms. Perez	SC0011282			
94	9/5/13	Instant message exchange from Mathew to Hortensia Perez	SC011277–278			
95	1/1/14	Instant message exchange from Mathew to Mr. Vinson	SC011280			
96	3/22/16	E-mail exchange between Ms. Perez and Mathew	SC005740–741			
97	3/11/16	E-mail exchange between Ms. Elad and Mathew	SC002071–2072			
98	3/24/16	E-mail exchange between Mathew and Ms. Perez	SC006355–6356			
99	4/19/16	E-mail message from Ms. Blackburn to Mr. Shaffer	SC001738–1739			
100	4/1/16	Instant message exchange between Mathew and Ms. Boyd	SC002901–2905			
101	4/18/16	E-mail message from Ms. Perez to Ms. Elad	SC005630			
102	4/19/16	E-mail exchange including e-mail messages in which Mathew sent to Ms. Blackburn, Mr. Burns and to her personal e-mail account and attachments	SC003542–3543, 3552, 3553, 3544, 2027, 2177, 4234, 4245, 4212, 3190, 3556, 3133			
103	2014	Santander's Information Security Policy	SC004548–4557			
104	1/28/16	E-mail message from Mathew to her personal e-mail address	SC003062			
105	2015	Mathew's 2015 Annual Performance Review	SC000936–000943			
106	2024	No records affidavit for Mathew's Baylor Scott & White	SC011292–303			

EXH NO.	DATE	DESCRIPTION	BATES	OFF.	OBJ.	ADM.
		Obstetrics & Gynecology – Frisco medical records				
107	2024	No records affidavit for Mathew’s Baylor Scott & White Obstetrics & Gynecology – Frisco billing records	SC011304–314			
108	2024	Mathew’s medical records from Baylor Scott & White Dallas Diagnostic Association - Plano	SC011330–397			
109	5/5/16	Facebook messages between Mathew and Heather Hutto-Leon	Mathew 336–338			
110	2016-2019	Facebook messages between Mathew and Demetrice Vasquez-Patton	Mathew 340–43			
111	8/28/16	Facebook messages between Mathew and Lyndy Parnell	Mathew 355–356			
112	5/12/16	Texas Workforce Commission Unemployment Benefits file of Mathew	Mathew 209-250			
113	1/18/16	E-mail message from Mathew to her personal e-mail address	Mathew 011			
114	1/18/16	E-mail message from Mathew to her personal e-mail address	Mathew 012–013			
115	12/8/15	E-mail message from Mathew to her personal e-mail address	Mathew 014–015			
116	12/6/15	E-mail message from Mathew to her personal e-mail address	Mathew 017–018			
117	12/1/15	E-mail message from Mathew to her personal e-mail address	Mathew 023–024			
118	12/5/15	E-mail message from Mathew to her personal e-mail address	Mathew 028–029			
119	1/19/16	E-mail message from Mathew to her personal e-mail address	Mathew 042–044			
120	2/19/16	E-mail message from Mathew to her personal e-mail address	Mathew 087–089			
121	3/1/16	E-mail message from Mathew to her personal e-mail address	Mathew 090–091			
122	2011–2016	Demonstrative exhibit regarding the timeline of events related to Mathew’s employment				
123		Demonstrative exhibit regarding “You Earned It” points				

Respectfully submitted,

HALLETT & PERRIN, P.C.
1445 Ross Avenue, Suite 2400
Dallas, Texas 75202
214.953.0053
(f) 214.922.4142

By: Monte K. Hurst
Monte K. Hurst
State Bar No. 00796802
Monte.Hurst@hallettperrin.com

Clayton S. Carter
State Bar No. 24120750
CCarter@hallettperrin.com

*Counsel for Defendant, Santander
Consumer USA Inc.*

CERTIFICATE OF SERVICE

On December 7, 2024, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the Court. I hereby certify that I have served Plaintiff's counsel as follows electronically or by another manner authorized by Rule 5(b)(2) of the Federal Rules of Civil Procedure:

Mr. Donald E. Uloth
DONALD E. ULOTH, P.C.
18208 Preston Road, Suite D-9 #261
Dallas, Texas 75248
Don.Uloth@uloth.pro

Monte K. Hurst
Monte K. Hurst